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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

CONSTANTIN DENIS MIHAI and
ARNOLD NAPOLES,

Plaintiffs,

v.

ALEJANDRO MAYORKAS, in his official
capacity as Secretary of Homeland Security,
U.S. DEPARTMENT OF HOMELAND
SECURITY, UR M. JADDOU, in her
official capacity as Acting Director of U.S.
Citizenship and Immigration Services, U.S.
CITIZENSHIP AND IMMIGRATION
SERVICES, the UNITED STATES OF
AMERICA and JOHN DOES I through
XX, inclusive,

Defendants.

Case No. 2:23-cv-01127-JAD-DJA

Stipulation and Order

(First Request)

Plaintiffs Constantin Denis Mihai and Arnold Napoles and Defendants Alejandro Mayorkas, Secretary of Homeland Security, US Department of Homeland Security, Ur M. Jaddou, Acting Director of U.S. Citizenship and Immigration Services, United States Citizenship and Immigration Services and United States of America ("Federal Defendants"), hereby stipulate and agree as follows:

Plaintiffs filed their Complaint on July 19, 2023.

Plaintiffs served the United States with a copy of the Summons and Complaint via Certified Mail on August 4, 2023.

1 The current deadline for the United States to respond to the Plaintiffs' Complaint is
2 on October 3, 2023.

3 Plaintiffs and the Federal Defendants, through undersigned counsel, stipulate and
4 request that the Court approve a 60-day extension of time, from October 3, 2023, to
5 December 4, 2023, for Federal Defendants to file a response to the Complaint, ECF No. 1.
6 This is the first request for an extension of time.

7 Plaintiffs' interview regarding their petition occurred on September 20, 2023. The
8 additional 60 days are necessary to complete the interview process and the request for any
9 additional information regarding the plaintiffs' petition with the United States Citizenship
10 and Immigration Services.

11 Therefore, the parties request that the Court extend the deadline for the United States
12 to answer or otherwise respond to December 4, 2023.

13 This stipulated request is filed in good faith and not for the purposes of undue delay.

14 Respectfully submitted this 3rd day of October 2023.

15 REZA ATHARI, MILLS & FINK, PLLC

JASON M. FRIERSON
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17 /s/ Gary Fink
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22 *Attorney for Plaintiffs*

/s/ Virginia T. Tomova
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23 **IT IS SO ORDERED:**

24 
UNITED STATES MAGISTRATE JUDGE

25 **DATED:** October 4, 2023